

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 16-10010-PBS
)
 JOHN TRAN)
)

1. Pursuant to Federal Rule of Criminal Procedure 16(d), the parties hereby stipulate that good cause exists for the following protective order in regard to certain discovery in this case.

3. "Defense team" shall include the defendant, counsel for the defendant, legal assistants, paralegals, investigators within the Federal Public Defender Office, as well as experts and other individuals hired specifically to assist in the preparation and trial of this case.

4. Notwithstanding the limitations in Paragraph 1, the defense team will be permitted to disseminate, duplicate or disclose materials designated as "Sensitive" to counsel of

record in other pending Website A/Operation Pacifier/Network Investigative Technique cases. When disclosing materials under this Paragraph, the defense team will inform the attorney to whom disclosure is made of the existence of this Order.

5. Nothing in this Stipulated Protective Order should be construed to restrict the use and dissemination of materials unsealed in other jurisdictions or otherwise available in the public domain.

SO STIPULATED:

DATED: December 8, 2016

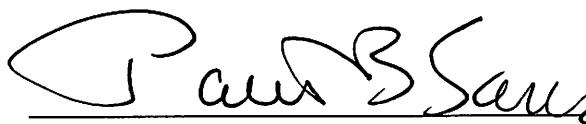
CARMEN M. ORTIZ
United States Attorney
By:

/s/ David G. Tobin
David Tobin
Assistant U.S. Attorney

DATED:

/s/ William Fick
WILLIAM W. FICK
Counsel for John Tran

IT IS SO ORDERED.

 Dated: 12/12/16
Hon. PATTI B. SARIS
Chief Judge, U.S. District Court